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**Jun 16 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

Honorable Grace Gilchrist Knie, Circuit Court Judge

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Appellate Case No.: 2024-001042  
Case No.: 2019-CP-46-01258

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Rachel Sanders, Respondent,

v.

Novant Health, Inc., Terracon Consultants, Inc., Panther Heating and Cooling Inc., Modern  
Construction of South Carolina, LLC Southern Realty, LLC, and, in their Individual capacities,  
George White, MD, Nicholas Tuttle, MD, and Malcolm Marion, MD, Defendants

Of which Modern Construction Services, LLC is the Appellant.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on June 16, 2025, a copy of Appellant's Letter to Court regarding incorrect information on the C-Track for e-filing was served upon all counsel of record via email containing the above-referenced document to counsel's individual email addresses:

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June 16, 2025

**VIA Email**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
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**SC Court of Appeals**

Re: ***Rachel Sanders v. Novant Health, Inc., et al.***  
Appellate Case No.: 2024-001042  
Trial Court Case No.: 2019-CP-46-01258

Dear Ms. Kitchings:

This firm represents Modern Construction Services, LLC, the appellant, regarding Appellate Case No. 2024-001042. I noticed recently that in the electronic filing system, C-Track, this firm is identified as representing Modern Construction of South Carolina, LLC. This firm does not represent Modern Construction of South Carolina, LLC, it only represents Modern Construction Services, LLC. Therefore, it appears that C-Track includes information that is incorrect. I bring this issue to your attention solely to point out the incorrect information identified on C-Track so that corrections may be made if necessary.

As an additional point, this firm is not aware of Modern Construction of South Carolina, LLC having filed anything relating to this appellate case.

If you have any questions, please call me at (864) 346-1112.

Sincerely,  
**WINDLE TERRY BIMBO**

A handwritten signature in blue ink, appearing to read "DR" followed by a stylized flourish.

Don R. Terry, Esquire